



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 14, 2014

Mr. Greg Bean  
Weyerhaeuser NR Company  
PO Box 188  
Longview, WA 98632

**Re: No. 19 Planer - Notice of Construction (NOC) Order No. 10371**

Dear Mr. Bean:

Please find enclosed the Notice of Construction (NOC) Order No. 10371. This order rescinds and replaces Order No. DE 03 AQIS-5416 issued on March 19, 2003. This order approves the increased VOC limit at the No. 19 Planer from 12.0 tons per year to 31.9 tons per year. The order does not approve any other physical changes or changes to the current methods of operation.

Also included are Ecology's responses to comments received in relation to the NOC.

If you have any comments/questions concerning the content of these documents, please contact Shingo Yamazaki at (360) 407-7563 or [shingo.yamazaki@ecy.wa.gov](mailto:shingo.yamazaki@ecy.wa.gov).

If you wish to appeal, you must follow the procedures described in the Order.

Sincerely,

Garin Schrieve, P.E.  
Industrial Section Manager  
Waste 2 Resources Program

Enclosures

Sent by Certified Mail No: 91 7199 9991 7033 1166 2577

cc: Brian Wood, Weyerhaeuser NR Company



WASHINGTON DEPARTMENT OF ECOLOGY  
MAIL STOP 47600  
OLYMPIA, WASHINGTON 98504

IN THE MATTER OF AIR EMISSIONS FROM:

Weyerhaeuser NR Company	)	NOC ORDER No. 10371
PO Box 188	)	
Longview, WA 98632	)	

**DESCRIPTION**

Weyerhaeuser NR Company owns and operates two existing dimensional lumber planer lines (No. 18 and No. 19 Planer) at the Longview Lumber manufacturing facility. Notice of Construction (NOC) order No. DE 03AQIS-5416 was issued on March 19, 2003 for No. 19 Planer. On November 5, 2013, the Washington State Department of Ecology (Ecology) received a NOC application from Weyerhaeuser NR Company. Ecology reviewed and accepted the NOC application as complete on November 21, 2013.

The four emission units associated with the No. 19 Planer are:

- 1.) No. 19 Planer Mill Dust Collection System;
- 2.) No. 19 Planer Anti-Sapstain Spray Booth;
- 3.) No. 19 Planer Ink-Jet Grade Stamper;
- 4.) No. 19 Shavings Bin Truck Loading Station.

Green lumber is sent to the No. 19 Planer where it is sprayed with an anti-sapstain chemical mixture to inhibit the growth of mold and fungi which would discolor and degrade the value of the finished lumber. A Spray Booth Fan collects anti-sapstain mist/vapors and routes them to a demister. Recoverable anti-sapstain is collected in the Collection Tank and recirculated for reuse in the spray process. The remaining anti-sapstain vapor is exhausted. The current anti-sapstain chemical mixture contains no regulated Federal Hazardous Air Pollutants (HAPs) but does use carrier agents which are volatile organic compounds (VOCs). Weyerhaeuser NR Company monitors the emission rates of these VOCs by assuming 100% volatile losses without accounting for VOC retention on the treated lumber.

Due to a decrease in customer tolerance for stained or discolored lumber, Weyerhaeuser NR Company has had to increase anti-sapstain application rates. The previous VOC emission limit of 12.0 tons per year was based on nominal design capacity of 400 million board feet (MMBF) per year and assuming anti-sapstain chemical use equivalent to 60 lb VOC/MMBF. Assuming a lower annual production rate of 318.5 MMBF per year and anti-sapstain chemical use equivalent to 200 lb VOC/MMBF, the projected annual emissions from the No. 19 Planer are 31.9 tons per year. Accordingly, Weyerhaeuser NR Company is requesting the VOC limit at No. 19 Planer be increased from 12.0 to 31.9 tons per year. The VOC emissions increase is greater than the new

source review exemption level (2.0 tons per year) but below the PSD significant emission rate (40 tons per year).

## FINDINGS

In relation to the above, Ecology, pursuant to RCW 70.94 and WAC 173-400, makes the following determinations regarding the project, if it is operated as herein required:

- 1.) The proposed project meets all applicable federal and state rules and regulations including: General Regulations for Air Pollution Sources, Chapter 173-400 WAC, New Source Performance Standards (NSPS), 40 CFR Part 60, and National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 61.
- 2.) Best Available Control Technology (BACT) will be used for emission control.
- 3.) The proposed project will not have a significant adverse impact on the environment.
- 4.) The proposed new emission from the modified source will not cause a violation of any ambient air quality standard.

This Order rescinds and replaces Order No. DE 03AQIS-5416.

## CONDITIONS

THEREFORE, IT IS ORDERED THAT the project, as described in said NOC permit application, and other information submitted to the Ecology in reference thereto, is approved subject to the following emissions limitation listed in Table 1 and the other conditions listed below.

**Table 1 : Requirements**

Emission Unit	Pollutant	Control Technology	Performance Limit
No. 19 Planer Dust Collection System	PM/PM <sub>10</sub>	Two primary cyclones (in parallel) followed by a high efficiency baghouse.	Visible emissions from the baghouse shall not exceed 10% as measured in accordance with EPA 40 CFR Part 60 Appendix A Method 9.  Compliance to be demonstrated by keeping inspection and maintenance records for the cyclones and baghouse.
No. 19 Planer Anti-Sapstain Spray System	VOC	Ultra low volume spray coating system combined with an overspray collection chamber, demister, and anti-sapstain	Emission Limits: 1. VOC 31.9 tons per year 2. Odors that may unreasonably interfere with any other property owner's use and enjoyment of property are prohibited.

Emission Unit	Pollutant	Control Technology	Performance Limit
		<p>recirculation system.</p> <p>Monitor weekly tracking of total anti-sapstain usage and VOC content.</p>	<p>Operational Requirements:</p> <ol style="list-style-type: none"> <li>1. Anti-sapstain fugitive and overspray emissions shall be controlled by operating the overspray chamber mist collection, demister, and recirculation system whenever the spray system is in service.</li> <li>2. Good practice and procedures shall be used to reduce odors to a minimum.</li> </ol> <p>Monitoring/Recordkeeping Requirements:</p> <ol style="list-style-type: none"> <li>1. Record on a weekly basis: <ol style="list-style-type: none"> <li>a. Quantity of anti-sapstain chemicals used in the common Anti-Sapstain Supply System used by No. 18 and No. 19 Planer lines;</li> <li>b. Quantity of lumber processed by No. 18 and No. 19 Planer Anti-Sapstain Systems;</li> <li>c. Concentration of anti-sapstain applied to lumber.</li> </ol> </li> <li>2. Calculate annual VOC emissions from No. 19 Planer Anti-Sapstain System as follows:  Annual VOC Emissions for No. 19 Planer =  (Planer Mill Anti-Sapstain Chemical Use, gallons x VOC content, lbs/gallon)  x  (MMBF lumber treated by No. 19 Planer Line/MMBF total lumber treated at Planer Mill)</li> <li>3. Log each occurrence of upset conditions and report upset conditions to Ecology as soon as possible.</li> <li>4. Log each occurrence of maintenance, inspection, and calibration activities.</li> </ol>

Emission Unit	Pollutant	Control Technology	Performance Limit
			Maintain on site for five years all records required by this order.

1. Within 60 days after achieving maximum production, but not later than 180 days after startup, Weyerhaeuser NR Company shall conduct performance tests for PM, PM10, and opacity from the No. 19 Planer Baghouse to be conducted by an independent testing firm. A test plan shall be submitted for Ecology approval at least 30 days before testing. Weyerhaeuser NR Company shall notify Ecology at least 7 days before testing.
2. Operation of the equipment must be conducted in compliance with specifications submitted as part of Weyerhaeuser NR Company's notice of construction applications dated January 23, 2003 and November 1, 2013, unless otherwise approved by Ecology.
3. Any activity, which is undertaken by Weyerhaeuser NR Company or others, in a manner which is inconsistent with the notice of construction applications dated January 23, 2003 and November 1, 2013 and this order, shall be subject to Ecology enforcement under applicable regulation. Nothing in this order shall be construed so as to relieve Weyerhaeuser NR Company of its obligations under any state, local, or federal laws or regulations.
4. Weyerhaeuser NR Company shall notify Ecology in writing within thirty days of startup.
5. This approval shall become void if construction is not commenced within eighteen (18) months after receipt of this approval, or if construction of the project is discontinued for a period of eighteen (18) months.
6. Operating and maintenance manuals for all equipment that has the potential to affect emissions to the atmosphere shall be developed and followed. Copies of the manuals shall be available to Ecology. Emissions above permitted levels that result from a failure to follow the requirements of the manuals may be considered proof that the equipment was not properly operated and maintained.
7. If any sampling ports and platforms are used after the final pollution control device, these ports shall meet the requirements of 40 CFR, Part 60, Appendix A, Method 1. Adequate permanent and safe access to the test ports shall be provided. Other arrangements may be acceptable if approved by Ecology prior to installation.

#### **YOUR RIGHT TO APPEAL**

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do both of the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.

- Serve a copy of your appeal and this Order on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320.

#### ADDRESS AND LOCATION INFORMATION

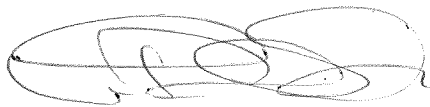
Street Addresses	Mailing Addresses
<b>Department of Ecology</b> Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	<b>Department of Ecology</b> Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
<b>Pollution Control Hearings Board</b> 1111 Israel RD SW STE 301 Tumwater, WA 98501	<b>Pollution Control Hearings Board</b> PO Box 40903 Olympia, WA 98504-0903

#### MORE INFORMATION

- **Pollution Control Hearings Board**  
[www.eho.wa.gov/Boards\\_PCHB.aspx](http://www.eho.wa.gov/Boards_PCHB.aspx)
- **Chapter 43.21B RCW, Environmental Hearings Office – Pollution Control Hearings Board**  
<http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21B>
- **Chapter 371-08 WAC – Practice and Procedure**  
<http://apps.leg.wa.gov/WAC/default.aspx?cite=371-08>
- **Chapter 34.05 RCW – Administrative Procedure Act**  
<http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05>
- **Chapter 70.94 RCW, Washington Clean Air Act**  
<http://apps.leg.wa.gov/RCW/default.aspx?cite=70.94>
- **Air Quality Rules**  
[www.ecy.wa.gov/laws-rules/ecywac.html#air](http://www.ecy.wa.gov/laws-rules/ecywac.html#air)

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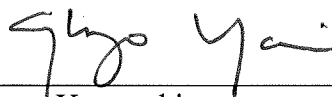
**SIGNATURES**



\_\_\_\_\_  
Garin Schrieve, P.E.  
Industrial Section Manager  
Waste 2 Resources Program

\_\_\_\_\_  
3/14/2014  
Date

Reviewed by:



\_\_\_\_\_  
Shingo Yamazaki  
Environmental Engineer

\_\_\_\_\_  
3/14/14  
Date

RESPONSE TO PUBLIC COMMENTS

**for the Notice of Construction Order No. 10371 issued to**

**Weyerhaeuser NR Company  
PO Box 188  
Longview, WA 98632**

State of Washington  
**Department Of Ecology**  
300 Desmond Drive  
PO Box 47600  
Olympia, Washington 98504-7600

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## 1.0 INTRODUCTION

Weyerhaeuser NR Company operates two planer mills (No. 18 and No. 19 Planer) at the Weyerhaeuser Longview facility. On November 5, 2013, the Washington State Department of Ecology (Ecology) received a Notice of Construction (NOC) application to increase potential VOC emissions from No. 19 Planer. The VOC emission limit from No. 19 Planer would increase from 12.0 to 31.9 tons per year.

Ecology published a notice of receipt of the NOC application on the agency's Air Permit Register on November 25, 2013. Ecology subsequently received a public request to hold a comment period on the proposed NOC. Ecology held a public comment period on the proposed NOC running from December 12, 2013 through January 13, 2013. This document serves as Ecology's response to the comments received.

## 2.0 ECOLOGY RESPONSE TO COMMENTS

Ecology received one set of comments. The comments were received in response to Ecology's Air Permit Register notification of application and prior to the start of the comment period on the NOC. Even though they were received prior to the beginning of the comment period, Ecology has decided to provide a response to the comments because they were received as a result of the initial public notice of the project.

### **Comments from Mrs. Yolanda Vanveen, submitted on December 3, 2013**

I would like to request public comment periods for the pending permits that have been submitted by Weyerhaeuser in Longview, Washington. I am doing research on the relationship between the Clean Air Act and state implementation and had some questions on the permit process for current locations and new construction orders and the relationship between the Washington Department of Ecology and the EPA. Your hard work is to be commended and any input and links to information is appreciated. I have added many questions. This is my assignment:

**Please select one provision Clean Air Act and explain why this provision has been effectively implemented OR remains an implementation challenge.**

CAA Effectively Implemented Title V Sections 501-507 of the CAA requires permits for all major industrial sources with state administration and federal oversight. Before the CAA there were no permit systems or monitoring of major industrial sources for pollution. Permits have successfully limited airborne lead pollution, a widespread health concern. The EPA effectively implemented Title V and effectively phased out lead in motor vehicle gasoline under Clean Air Act authority. How can the CAA cleanup industrial pollution?

*"The Clean Air Act requires that when new industrial facilities are designed and built, good pollution control must be part of the design. This means that as new, cleaner facilities are built, the country's industrial base becomes cleaner overall. Public health is protected as economic growth proceeds. In areas not meeting air quality standards, to avoid making pollution worse, new and modified large plants and factories must meet the lowest achievable emission rate and*

*obtain offsetting emissions reductions from other sources. In areas that meet air quality standards, new and modified large plants and factories must apply the best available technology considering cost and avoid causing significant degradation of air quality or visibility impairment."* [1]

### **CAA Challenges**

**1. Coordinating corporate, county, state and federal agencies in the permit process.** The chart in our textbook Percival et al., *Environmental Regulation: Law, Science, and Policy*, 7th ed., 2013. P. 529 notes existing sources of regulatory targets are administered by the states while new construction and businesses must follow state and federal guidance. The relationship between federal and state administration of the CAA has been effective in some areas while remains an implementation challenge in others.

**2. Phasing in the tailoring rule.** On May 13, 2010, the EPA issued the greenhouse gases "tailoring rule" to regulate stationary sources under the Clean Air Act's New Source Review and Prevention of Significant Deterioration (PSD) program. This rule sets greenhouse gas emission thresholds that define when permits under the PSD and Title V Operating Permit programs are required for new and existing industrial facilities. The tailoring rule adopts a phased approach under which only the nation's largest greenhouse gas emitters—in general, those emitting more than 100,000 tons of CO<sub>2</sub> per year—would be covered and small businesses would be exempt for at least 10 years. Industries covered by this rule include power plants, refineries and cement production facilities. The first part, known as a state implementation plan call, requires 13 states to revise their Clean Air Act implementation plans to ensure that businesses planning to build new, large facilities or make major expansions to existing ones will be able to obtain PSD permits that address greenhouse gases. The second part establishes a federal implementation plan that would allow the EPA to issue PSD permits in any state unable to submit state implementation plan revisions by January 2, 2011. Thirty-six states have already received federal approval to issue greenhouse gas permits. [2]

**3. Corporate self regulation.** The EPA has allowed corporations to "self regulate" as in the case of Weyerhaeuser. They do report emissions and spills that are a threat to health. According to a 1995 article, "the Environmental Protection Agency will not pursue Clean Air Act enforcement action against Weyerhaeuser. Nine wood-products facilities in Georgia, Arkansas, North Carolina, Alabama, Mississippi and Oklahoma originally were cited. After a three-year process, the EPA and U.S. Department of Justice said Weyerhaeuser's work confirmed it had conducted its own "self-auditing and compliance correction" and had cooperated with federal authorities. Earlier, Weyerhaeuser agreed to pay penalties to the states." [3]

Are they currently self regulating?

Are there any independent testing or monitoring systems?

How does the self regulation work?

Do they report to Washington or the EPA or both?

I understand that they report their TRI levels (do they report every six months?) and spills but is there more to self regulation?

How are air emission levels determined on windy days compared to stagnant air days?

Is there a difference?

If the states are responsible for administering the CAA but the EPA has allowed them to self

regulate, how does the Washington State Department of Ecology fit in to the process?  
Is it only in the permit process for new construction?

**4. Transfer of property and monitoring systems exemption.** Ecology notified the Weyerhaeuser Company in a letter from Ecology's Air Quality Program dated November 24, 2008, that the transfer of the property ownership to Weyerhaeuser NR Company did not constitute a change in ownership and therefore the facility is not applicable to the requirements of Part II of WAC 173-407. The court upheld that Title V Permits could not impose new monitoring requirements if monitoring requirements already existed. Each permit contains terms and conditions that assure compliance with all applicable requirements. This requirement has been interpreted to mean literally at all times. [4]

**5. State permit authority in relation to federal rules.** Title V of the Federal Clean Air Act Amendments requires all states to develop a renewable operating permit program for industrial and commercial sources of air pollution. An important issue regarding any Title V permit is the basis of authority for the applicable requirements. Early on in the permitting process, Washington Department of Ecology attempted to sort out the regulatory basis for the orders. Ecology determined that this was not possible. Many of the orders originated years ago and the basis of authority was not clearly set forth at the time of issuance. In addition, order consolidation has gone on in the past further confusing the original basis of authority. Ecology decided the effort, besides being difficult, was not necessary as WAC 173-401-615 offered a solution to this problem. With the Permittee's agreement in the case of Weyerhaeuser, the issue of state-only or federal applicability was put aside as it was agreed to rely entirely on WAC 173-401-615 as the basis of authority for the type and frequency of monitoring. WAC 173-401-615 requires monitoring and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. This regulation is federally enforceable. Monitoring and recordkeeping requirements based on this regulation are federally enforceable.

**WAC 173-401-615 Monitoring and related recordkeeping and reporting requirements. [5]**

(c) Retention of records of all required monitoring data and support information for a period of five years from the date of the monitoring sample, measurement, report, or application.

(a) Submittal of reports of any required monitoring at least once every six months.

**6. New permit/NPDES process**

On November 13, 2013, the Washington Department of Ecology (Ecology) issued a Notice of Construction Order (NOC) in Weyerhaeuser, Longview to expand production to include antifungal wood treatment. The public may request a comment period on this action under WAC 173-400-171. The request period runs November 25 - December 10, 2013. If no "one" makes a request, Ecology will issue the order without holding a comment period on it. I would like to request a public comment period. [6]

A NPDES permit is normally issued every five years. Why has it been nearly ten years since the last NPDES permit?

Sets limits on the kinds, amounts and concentrations of pollutants a facility may release. What are the current levels and limits?

Requires a facility to measure, test and report its pollutants.  
Prescribes “best management practices.” [7]

### **7. Lack of information/details of the components of the antifungal spray**

It is a large increase in air toxins and Cowlitz County already has one of the worst ratings in the country for air pollution and there are health consequences. At the same time, I understand that antifungal solutions are needed so that wood is not lost.

What are the anti-fungal spray ingredients? We know they are VOCs but I can't find details of their actual composition.

What are the health risks to humans of the antifungal TRIs?

What are the risks to flora and fauna including bees, butterflies, fish, frogs and other wildlife surrounding the area?

The order allows the Longview Lumber manufacturing facility to increase the application rate of anti-fungal spray applied to lumber products.

Weyerhaeuser expects volatile organic compound (VOC) air emissions to increase from 12 tons/year to 31.9 tons/year for this activity.

Have all antifungal options that would not be dangerous to the public been considered? Are there alternatives that have been considered?

For example, lactic acid from milk products has many antifungal properties and is not as dangerous to the environment.

Vinegar and Juniper extracts have been found to work as well.

Is previous research on less dangerous options available?

If there are no other viable options, are their filtration systems that can be installed to reduce air and water emissions?

Is there technology that can be installed to decrease the emissions?

Is the best available technology being used in the proposal?

Has phytoremediation been considered as a filtration system for water and ground emissions?

### **Common VOC Antifungals.**

**Creosote:** Coal tar creosote is a thick, oily liquid that is typically amber to black in color and contains coal tar products, including PHENOLS and PAHs. It is used as a wood preservative to prevent fungal growth on rail ties, dock pilings and other susceptible items. It is insoluble in water. It is also highly toxic and one of the components at many Superfund sites.

### **Propiconazole; IPBC Polyphase and Permethrin**

**FLAMMABLE. HARMFUL; DANGEROUS FOR THE ENVIRONMENT.** May cause lung damage if swallowed; Toxic to aquatic organisms; May cause long term adverse effects in the aquatic environment, H226 - Physical Flam. Liquid & vapour - Category 3 H304 - Health EUH066; Asp. Tox. 1 H411 - Environmental Aquatic Chronic 2

**Permethrin-**Very toxic to aquatic organisms, fish and bees, may cause long-term adverse effects in the aquatic environment. This material and its container must be disposed of as hazardous waste. Avoid release to the environment. Symptoms of overexposure include increased hypersensitivity to touch and sound, tremors and convulsions. Contact with permethrin may produce skin sensations such as numbing, burning or tingling. Permethrin is highly toxic to fish. Care should be taken to avoid contamination of the aquatic environment. Permethrin is slightly toxic to birds.

### **8. TRI and permit information confusion over monitoring numbers**

According to TRI the Longview Weyerhaeuser plant released 947,615 lbs of VOC air emissions in 2011 total for all compounds. Are there more recent numbers? The permit notes that 12 tons of air VOC a year and it will increase to 31.9. What are the totals and breakdowns of all compounds then?

Do you have a copy or link to the most recent TRI and how those numbers fit in to the report? Is there an Environmental Impact Statement and details of the names of the VOC materials that will be released and amounts and how those amounts fit in to the totals? What are the potential health risks related to the increased TRI VOC releases?

### **9. Lack of alternative treatment considerations**

Traditional wood treatments are becoming an environmental issue as the public demands more benign options. Have less dangerous options been considered?

Garlic oil, Clove oil, Olive oil [8]

The use of lactic acid bacteria which are considered safe for general use is a potential alternative to the conventional heavy metal chemicals currently in use.

White vinegar: An antifungal that also kills germs and bacteria. It is still dangerous if dumped in large amounts in the Columbia River but less toxic than many options.

Antifungal Activity of Organic Extracts from *Juniperus virginiana* Heartwood against Wood Decay Fungi [9]

Antibacterial and antifungal activities of *Euroschinus papuanus*. Antifungal activity was exhibited by the B fractions of leaves, stem heartwood and root bark. [10]

### **10. Current level of toxins in the air**

The EPA has predicted that there are 14 air toxics in Cowlitz County at concentrations that could potentially cause adverse health effects (cancerous or noncancerous) including Acrolein, Benzene, Bis(2-ethylhexyl), phthalate, Butadiene, Carton, Tetrachloride, Chloroform, Chromium VI, Diesel Particles, Ethylene, Dibromide, Formaldehyde, Napthalene, Quinoline, Tetrachloroethane, and POM Group 1. There are five air toxics that exceeded one or more of the health screening levels: Acetaldehyde, Arsenic, Benzene, Formaldehyde, and Manganese. Bloody noses are a symptom of poisoning from many of these toxins. [11]

### **11. The pollution on the Columbia attributed to Longview industries**

The contamination in the Columbia River basin poses an "unacceptable risk" to people, fish and wildlife, the U.S. Environmental Protection Agency [7] said after issuing its first comprehensive report on toxic pollution in the massive Columbia system back in 2009. Why then has little been done to stop the continued pollution? There is increasing societal awareness and concern about toxics in our environment. The Environmental Protection Agency (EPA) estimates that there are between 80,000 and 100,000 chemicals in use in our personal lives, in business and in commerce. Many of these chemicals are making their way into the magnificent Columbia River Basin and affecting the ecosystem and the fish that tribal people have consumed for 10,000 years or more. [12]

### **12. Health dangers for workers, the neighborhood and citizens of Longview and Cowlitz County.** It is difficult to attribute directly to air emissions but a reasonable person could see a

connection. When I lived in Kalama, Washington I learned from experience about the level of paper and wood industry pollution in Longview, Washington. I went shopping often on days that the air was so thick that I could not see across the street. It was worse than Beijing, China. After walking across the street and breathing the thick polluted air my son Ethan started throwing up for an hour and his twin James had a bloody nose shortly after coming home that wouldn't stop. A reasonable person could assume that the high levels of hazardous materials in the air in Longview, Washington could contribute to this sad fact. We moved away from Longview, Washington two years ago and the number of incidents of bloody noses has reduced but not stopped. My son James has a bloody nose currently at least twice a month.

**According to the GOVERNOR'S INTERAGENCY COUNCIL ON HEALTH**

**DISPARITIES, my children are not the only ones to have adverse health reactions to the air pollution,** "The Highlands neighborhood sits on the South end of the City of Longview within a half-mile of the Columbia River. Industrial lands separate the Highland's community from the Columbia River to the south with additional heavy industrial land uses located immediately to the west and east of the neighborhood (See map of TRI sites below). Most of the industries that surround the Highlands' Community are EPA Toxic Release Inventory (TRI) Sites. EPA TRI data indicates that directly across the street from the neighborhood is one of the biggest emitters of air and surface water pollutants in WA State – Weyerhaeuser." [13]

The Highlands neighborhood holds a much higher percentage of: a) persons living below the poverty line; b) Hispanic population; c) minority population; and d) population under the age of 18 in comparison to the City of Longview, Cowlitz County, and Washington State (See chart below). The residents of Highlands already experience disproportionate poor health outcomes with respiratory illnesses, cancer, and heart disease in comparison to their more affluent counterparts and other Cowlitz County communities. Adding an additional polluting industry (coal or other toxic release industries) in the vicinity of the neighborhood will only make their health concerns worsen. All citizens, regardless of their ethnicity or socioeconomic status, should equally share the environmental amenities and the burdens of environmental health hazards. The proposed construction will cause the Highlands community to once again be overburdened with the health hazards, a form of injustice and unfairness.

According to 2007-2009 Washington State Department of Health Death Certificate Data, the Highland District has significantly higher deaths associated with chronic respiratory illness, cancer and heart disease. They are more than twice the levels of Washington state. The Crude Mortality Rate in the Highland District is approximately 1400 out of 100,000 people. Cowlitz County is approximately 850 people while Washington state is 700 people per 100,000. A reasonable person would assume that the high mortality rates directly are related to the close location to the TRI release inventory sites. Increasing the air emissions as the permit requests, would lead to even more deaths in the Highland District as well as Cowlitz County. Are there recent statistics?

**13. The current TRI sites in the area make Longview one of the most toxic areas of the country and the world.** Shouldn't we be reducing not increasing emissions?

Map of Toxic Release Inventory Sites in Kelso-Longview, WA Number Name TRI ID [14]  
1 COOPER OIL INC LONGVIEW BULK PLANT 98632CPRLN940IN

2 FLEXIBLE FOAM PRODUCTS INC 98632FLXBL125PR  
3 HASA INC 98632HSNCX341IN  
4 PPG INDUSTRIES INC 98632QCHLR3541I  
5 SOLVAY CHEMICALS INC 98632NTRXM3500I  
6 WEYERHAEUSER NR CO - LONGVIEW 98632WYRHS3401I  
7 WILTECH CORP. 98632WLTCH1203C  
8 AMERICAN CABINET CONCEPTS INC. 98632MRCNC1021C  
9 CONRAD WOOD PRESERVING CO 97048CNRDW29175  
10 US GYPSUM CO 97048NTDST29073  
11 MILLENIUM BULK TERMINALS NONE  
12 FOSTER POULTRY FARMS KELSO PLANT 98626FSTRP1700S  
13 GLACIER NW INC LONGVIEW READY-MIX PLANT 98632GLCRN11003  
14 KEMIRA WATER SOLUTIONS INC 98632MRCNC850TH  
15 ALL PURE CHEMICAL CO. 98625LLPRC1265N  
16 TOLLYCRAFT ACQUISITION CORP. 98626TLLYC2200C  
17 LONGVIEW FIBRE PAPER & PACKAGING INC 98632LNGVWSOUTH  
18 PACIFIC COATING & LAMINATING 98626PCFCC500CL  
19 SIMPSON LUMBER CO LONGVIEW LUMBER OPS 98632LNGVW54THI  
20 STOWE WOODWARD 98626STWWD2209T

**14. Pollution contribution to chronic diseases and crude mortality rates in the area.**

According to 2007-2009 Washington State Department of Health Death Certificate Data, the Highland District has significantly higher deaths associated with chronic respiratory illness, cancer and heart disease. They are more than twice the levels of Washington state. The Crude Mortality Rate in the Highland District is approximately 1400 out of 100,000 people. Cowlitz County is approximately 850 people while Washington state is 700 people per 100,000. A reasonable person would assume that the high mortality rates directly are related to the close location to the TRI release inventory sites. Increasing the air emissions as the permit requests, would lead to even more deaths in the Highland District as well as Cowlitz County. Are there recent statistics?

**15. Water Concerns in groundwater and rivers.** Bad water has also been a problem in the Highlands area. Residents report that the tap water has had a metallic taste and sulphuric odor. The city began receiving complaints from people in that area shortly after switching its water supply Jan. 31, 2013 to groundwater wells at the Mint Farm Water Treatment Plant, Longview Public Works Director Jeff Cameron said. "It doesn't taste like water. It tastes like diesel," said Eric Howard. The off-taste, odor and yellowish color are a result of a buildup of rust and corrosion in the area's water mains, which are made of galvanized pipe installed in the 1920s when Longview was built, Cameron said. The city is trying to determine the precise cause of the headache, but Cameron speculated that the corrosion in the pipes is being dislodged because the water flow changed directions when the city stopped pumping its water from the Cowlitz River. [15]

What was the final conclusion?

Why did they stop pumping from the Cowlitz River?

What is the condition of the Cowlitz, the Columbia and the well water on properties surrounding the industrial plant and from the Mint Farm Water Treatment Plant?

Are their toxins in the water in the Highlands area?  
Has the water or sediment been tested?  
How does the Clean Water Act fit in to the issue?

**16. The importance of a public comment period and hearing.** A public comment process is important and even if there are no comments. The public should know about the project and have an opportunity for input. Please allow a comment option and add this e-mail to comments on the proposed National Pollutant Discharge Elimination System (NPDES) permit for the Weyerhaeuser NR Company Longview pulp and paper mill and the new anti-fungal wood plant construction.

**17. Agency and Environmental group input**

What do you think are the challenges to the permit process and compliance with the CAA?  
Do you have suggestions or solutions on reducing toxic air emissions in the Northwest that have not been addressed?

The Northwest has a wealth of natural resources and it is a challenge regulating and setting standards that encourage industry expansion as well as environmental protection. Weyerhaeuser's presence in Washington state has employed many citizens and led to the state having the highest minimum wage in the country while supporting many families. There must be incentives and grants for environmental controls and the availability of less toxic materials for manufacturers for the future of citizens, flora and fauna of the Highland area of Longview, Washington, Cowlitz County, the State of Washington, the Northwest and the United States. I think that the questions asked should be considered before making final decisions so a public comment process is in order.

Respectfully,

Yolanda Vanveen

- [1] <http://www.epa.gov/air/caa/progress.html#pollution>
- [2] <http://watchlist.vermontlaw.edu/first-u-s-greenhouse-gas-rules/>
- [3] <http://community.seattletimes.nwsources.com/archive/?date=19950710&slug=2130661>
- [4] [http://www.ecy.wa.gov/programs/swfa/industrial/IND\\_PERMITS/AirPermits/WeyLong\\_SD\\_mod12.pdf](http://www.ecy.wa.gov/programs/swfa/industrial/IND_PERMITS/AirPermits/WeyLong_SD_mod12.pdf)
- [5] <http://apps.leg.wa.gov/wac/default.aspx?cite=173-401-615>
- [6] [http://www.ecy.wa.gov/programs/swfa/industrial/pulp\\_weyerlong.html](http://www.ecy.wa.gov/programs/swfa/industrial/pulp_weyerlong.html)
- [7] <https://fortress.wa.gov/ecy/publications/publications/1307046.pdf>
- [8] <http://www.soeagra.com/abr/june2013/26.pdf>
- [9] [http://hero.epa.gov/index.cfm?action=reference.details&reference\\_id=1107919](http://hero.epa.gov/index.cfm?action=reference.details&reference_id=1107919)
- [10] <http://www.ncbi.nlm.nih.gov/pubmed/15159010>
- [11] [http://yosemite.epa.gov/R10/airpage.nsf/Air+Toxics/summit+region+x/\\$FILE/Day1-Longview-Toxics-Study.pdf](http://yosemite.epa.gov/R10/airpage.nsf/Air+Toxics/summit+region+x/$FILE/Day1-Longview-Toxics-Study.pdf)
- [12] [http://www2.epa.gov/sites/production/files/documents/columbia\\_river\\_toxics\\_action\\_plansept2010.pdf](http://www2.epa.gov/sites/production/files/documents/columbia_river_toxics_action_plansept2010.pdf)
- [13] <http://healthequity.wa.gov/Portals/9/Doc/Meetings/2013/09-11/HDC-Packet-09-11-13.pdf>

[14] <http://healthequity.wa.gov/Portals/9/Doc/Meetings/2013/09-11/HDC-Packet-09-11-13.pdf>  
[15] [http://tdn.com/news/local/bad-water-mains-making-matters-worse-in-highlands/article\\_4da89690-ec26-11e2-ab90-001a4bcf887a.html](http://tdn.com/news/local/bad-water-mains-making-matters-worse-in-highlands/article_4da89690-ec26-11e2-ab90-001a4bcf887a.html)

### **#1, 2, 4, 5, 10, 11 – Ecology’s Response**

These provided comments are statements made by the commenter. Comments noted.

### **#3 – Ecology’s Response (original comments in *italics*)**

*Are they currently self regulating?*

Congress established the Clean Air Act permitting program as a self monitoring program therefore Weyerhaeuser Longview is self-monitoring for compliance with the given environmental regulations. Ecology does not have the resources to dedicate to provided independent monitoring at all the facilities across the state. Facilities are required to submit monthly reports to Ecology specifying compliance/non-compliance with their environmental permits. There are severe penalties, both civil and criminal, for falsifying data. A company executive, or delegated personnel, must certify the all submitted results.

*Are there any independent testing or monitoring systems?*

Ecology performs annual inspections of Weyerhaeuser Longview. These yearly inspections consist of approximately three water inspections and one air inspection. During these inspections, Ecology reviews monitoring data, emission units, emission control devices, facility inspection checklist, and other permit requirements. At least one of the water inspections includes sampling by Ecology. As a condition of their permit, the facility is required to grant Ecology representative access to the facility.

In addition, Weyerhaeuser Longview hires a third-party to analyze the gases emitted from their stacks for pollutants. These stack tests are reported to Ecology and can be reviewed upon request.

*How does self-regulation work?*

See above.

*Do they report to Washington or the EPA or both?*

For the most part Ecology. EPA has delegated authority for Ecology to perform regulatory oversight of a lot of the programs. EPA has some additional requirements that the facilities must meet that are reported directly to EPA. This differs from state to state depending on whether a state has a delegated program in place.

*I understand that they report their TRI levels (do they report every six months?) and spills but is there more to self regulation?*

The Toxic Release Inventory (TRI) program is an EPA program which tracks the release of chemicals to the air, water, or land. Weyerhaeuser has annual reports which can be found at EPA's TRI Program website. Releases are self-reported, reported by the communities, or by inspectors. As previously stated, Ecology does not have the resources to continuously monitor these facilities. That being said, when a spill is reported, Ecology has a spill response team that is notified and if the spill is of significance, they will travel to the site to investigate.

*How are air emission levels determined on windy days compared to stagnant air days? Is there a difference?*

The quantity of emissions is not affected by wind direction/intensity. Air emissions are measure inside the stacks. Ecology measures compliance with environmental regulations using this in-stack data. That being said, how the air emissions affect surrounding communities is affected by atmospheric conditions.

*If the states are responsible for administering the CAA but the EPA has allowed them to self regulate, how does the Washington State Department of Ecology fit in to the process?*

*Is it only in the permit process for new construction?*

EPA has delegated Ecology with the responsibility of regulating these facilities. By necessity, regulation is conducted through self-regulation. EPA will review many of Ecology's decisions like permit issuances; EPA also performs audits on the State delegate programs to evaluate how well they are being implemented by the state.

#### **#6 – Ecology's Response**

These provided comments are related Weyerhaeuser Longview's draft NPDES permit and are not applicable to this comment period.

#### **#7, 9 – Ecology's Response**

The active anti-fungal spray ingredients are propiconazole and IPBC (3-Iodo-2-propynyl butyl carbamate). The carrier agents which allow for uniform application are the VOCs. These VOCs are regulated as a group and are not broken down into their individual constituents.

Weyerhaeuser Longview has implemented the Best Available Control Technology (BACT) to minimize the impact of air emission from the process of spraying lumber. The regulations require that Weyerhaeuser Longview implement the best control technology that is in use by industry. Wood treatment technologies which have not been proven at scale, pose the risk of not being logistically/economically feasible, or may not meet stringent customer specifications for the product.

#### **#8 – Ecology’s Response**

Weyerhaeuser Longview reports an annual emission summary to Ecology. These emissions are available upon request.

#### **#12, 14, 15, 17 – Ecology’s Response**

These comments are outside of the scope of this proposal. No formal response has been provided by Ecology.

#### **#13 – Ecology’s Response**

Ecology is always looking to protect human health and the environment. When approving such emission increases, the impact to the environment is assessed to ensure the appropriateness of the proposal.

#### **#16 – Ecology’s Response**

Comment noted.